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[Scope of Review re Challenges to Antiquities Act 9 6 17.docx](#)

Jack-

Per our discussion and with thanks to Ryan for taking the laboring oar, attached is a draft memo addressing the scope of judicial review and how that affects our strategy for proclamations and associated documents. Happy to chat of course.

-Aaron

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**MEMORANDUM**

DATE: September [REDACTED], 2017

FROM:

SUBJECT: Challenges to national monument Proclamations

(b)(5) DPP (b)(5) ACP, (b) (5) AWP



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